

Broadcast Localism  
MB Docket No. 04-233  
Comment Summary

*Ms. Dourian also states that the Power 106 website provides station information and provides a "community calendar" listing upcoming events in the community.*

**Dubow, Craig/Gannett Broadcasting (11/1/04)**

Mr. Dubow submits a summary from each station owned by Gannett Broadcasting detailing each stations commitment to its community through the provision of local news, local programming, and community service efforts, as determined at the local station level.

**EchoStar Satellite, LLC (Echostar) (11/1/04)**

EchoStar questions whether individual television stations are meeting their public service obligations, or providing only "a minimal amount of local programming." If the latter, EchoStar asks if such stations can "really be deemed 'local' for purposes of the [Satellite Home Viewer Improvement Act], (SHVIA)" and therefore "entitled to carriage throughout a television market." EchoStar asserts that "many television stations are failing in their obligations to provide viewers with local programming, including news and other public affairs programming."

The company submits its own study of the stations it carries on "wing" satellites to assert that very few TV stations could meet any of the following: the FCC's old 5/10 processing guidelines, i.e., a station needed to demonstrate that it aired more than 5% local programming and 10% non-entertainment programming for its renewal application to be granted at the staff level; or the 4 percent set-aside EchoStar must meet, i.e., under 47 U.S.C. §335, EchoStar as a DBS operator must set aside 4 percent of its total bandwidth for public affairs programming; "or even the three hour per week requirement [for locally produced programming] imposed on low power Class A stations." EchoStar claims its findings "are not unique," and that "a number of other studies reveal that a significant number of stations offer little to no local content, and that many stations act merely as 'spigots' for nationally delivered programming."

EchoStar submits that "there is one very simple, and very compelling, incentive that the Commission could adopt" to encourage broadcasters to meet their local programming obligations: to be defined as a "local" station for purposes of carriage under SHVIA, television stations should meet some "minimal standard of local programming." Specifically, EchoStar proposes that the Commission adopt a rule defining "local television broadcast station" for purposes of signal carriage under SHVIA as a station "which airs unique locally produced programming designed to meet the documented needs of viewers within their service area for at least four percent of each broadcast week." This rule change, EchoStar argues, "could provide the ultimate incentive for television stations to meet their public interest obligations: Provide some amount of local programming, or you are not guaranteed carriage on multivideo programming distribution (MVPD) systems." EchoStar claims that this proposal "advances the Congressional intent behind must carry - that viewers should have access to all local programming." It argues that "if a station chooses not to air any local programming, it should not be heard to complain that it is not being carried by an MVPD" such as EchoStar.

Broadcast Localism  
MB Docket No. 04-233  
Comment Summary

EchoStar concludes that “marketplace forces should be allowed to work in all realms of television programming distribution, and there should be no must carry regulation.” But it submits that “what has evolved is an unbalanced playing field. So long as EchoStar is burdened with programming obligations, the beneficiaries of the special treatment accorded them by Congress should at least live up to Congress's assumptions that they are meeting their public interest obligations by originating and airing local programming.”

**Educational Media Foundation (EMF) (11/1/04)**

EMF is the licensee of hundreds of noncommercial educational radio broadcast and FM translator stations serving communities throughout the country with educational programming, including religious and family-oriented programming and contemporary Christian music, as part of either the K-LOVE Radio Network or the Air-1 Radio Network. EMF urges the Commission to reject any proposal to give LPFM stations a preference over FM translator stations and to adopt a rule permitting noncommercial FM translator stations to broadcast local announcements of particular interest to the communities in which the stations are located.

EMF contends that noncommercial FM translator stations, such as those operated by EMF, provide an important public benefit by serving rural areas as well as underserved, niche markets that are often overlooked by full power radio stations. EMF argues that, while LPFM stations may expand the options available to underserved groups, it is not in the public interest to deprive the public of service on which it has come to rely.

EMF asserts that comments filed in this proceeding reveal that EMF's translator stations have become an invaluable part of the communities in which they operate, and that their listeners have come heavily to rely upon them. EMF claims that the ability of increased numbers of new LPFM stations to initiate service cannot outweigh the detriment to the public interest that will be caused by the disruption of established listening patterns and the potential deprivation of millions of listeners of programming on which they have come to depend.

EMF argues that this lack of public interest benefit is especially likely since LPFM stations, while permitted to originate local programming, are not required to do so. EMF believes that a rule that prefers LPFM stations over FM translators will simply result in the displacement of an established service that serves the specialized needs of niche listeners with an unproven new service.

EMF suggests that one way in which the Commission could enhance localism without harming the public, however, would be to permit noncommercial FM translators to air public service announcements and other local announcements of particular interest to the communities in which the stations are located. As the Commission notes, translators currently are forbidden from originating programming except for emergency warnings of imminent danger and limited announcements seeking or acknowledging financial support.

Broadcast Localism  
MB Docket No. 04-233  
Comment Summary

*EMF further suggests that this rule should be relaxed to permit limited origination by noncommercial FM translators of local public service announcements or local news reports. EMF claims that such a change would be in keeping with the current rules permitting the insertion by FM translators of emergency warnings and donor announcements while not unduly expanding the existing role of these stations.*

**Emmis Communications Corporation (Emmis) (11/5/04)**

Emmis submitted questionnaires titled "How Do You Serve Your Local Community? A Broadcaster's Commitment to Localism" that had been completed by two of its radio stations, KTAR (Phoenix) and KKFR (Glendale/Phoenix).

In these questionnaires, the stations answered questions detailing the amount of community input, community involvement, local programming, political programming, the arts, emergency programming, and cultural events programming that each station offered.

Regarding the transition to digital programming, both stations state that they anticipate the opportunity to broadcast dual signals. Both stations oppose a change in the FCC's rules on advertising practices and rates for candidates for public office, and both state that "without limits the advertising amounts could cripple a station's inventory/revenue for a specific pre-election time period."

**Emmis Television Broadcasting LLC (WSAZ-TV) (Emmis Television) (11/5/04)**

Emmis submitted a questionnaire titled "How Do You Serve Your Local Community? A Broadcaster's Commitment to Localism" that had been completed by its television station WSAZ (Huntington/Charleston, WV).

In the questionnaire, the station answered questions detailing the amount of community input, community involvement, local programming, political programming, programming for the arts, emergency programming, and cultural events programming that the station offered.

Regarding the transition to digital programming, the station states that hundreds of thousands of dollars will be required to produce its news and documentary programs in HD, and there will be no additional return on this investment. The station opposes a change in the FCC's rules on advertising practices and rates for candidates for public office, and states that candidates already receive the lowest unit rates and that any change in the system will result in cumbersome and confusing regulations and paperwork.

**Entercom Boston License, LLC (Entercom Boston) (11/1/04)**

Entercom Boston states that, in its 1981 order deregulating radio, the FCC correctly pared down its non-entertainment programming guidelines for commercial radio to require only that stations offer programming responsive to issues that the licensee determines are of concern to station

Broadcast Localism  
MB Docket No. 04-233  
Comment Summary

listeners. According to Entercom Boston, since this deregulation, radio licensees have *encountered ever increasing competition from outlets such as cable TV, the Internet, and satellite TV*, creating economic incentives for broadcasters to air community responsive programming. Entercom Boston states the Boston stations make concerted efforts to program to the tastes of the community, and sponsor, support and participate in local community events and causes, including fundraising, broadcasting of local talk shows and local musicians. Entercom Boston attaches materials that it states document its commitment to community responsive programming and activities.

**Entercom Buffalo License, LLC (Entercom Buffalo) (11/1/04)**

Entercom Buffalo states that, in its 1981 order deregulating radio, the FCC correctly pared down its non-entertainment programming guidelines for commercial radio to require only that stations offer programming responsive to issues that the licensee determines are of concern to station listeners. According to Entercom Buffalo, since this deregulation, radio licensees have encountered ever increasing competition from outlets such as cable TV, the Internet, and satellite TV, creating economic incentives for broadcasters to air community responsive programming. Entercom Buffalo states the Buffalo stations make concerted efforts to program to the tastes of the community, and sponsor, support and participate in local community events and causes, including charity fundraising, and the airing of local music. Entercom Buffalo attaches materials that it states document its commitment to community responsive programming and activities.

**Entercom Denver License, LLC (Entercom Denver) (11/1/04)**

Entercom Denver states that, in its 1981 order deregulating radio, the FCC correctly pared down its non-entertainment programming guidelines for commercial radio to require only that stations offer programming responsive to issues that the licensee determines are of concern to station listeners. According to Entercom Denver, since this deregulation, radio licensees have encountered ever increasing competition from outlets such as cable TV, the Internet, and satellite TV, creating economic incentives for broadcasters to air community responsive programming. Entercom Denver states the Denver stations make concerted efforts to program to the tastes of the community, and sponsor, support and participate in local community events and causes, including charity fundraising, and the airing of two hours of local music every Monday and an average of five hours of local music per day. Entercom Denver attaches materials that it states document its commitment to community responsive programming and activities.

**Entercom Gainesville License, LLC (Entercom Gainesville) (11/1/04)**

Entercom Gainesville states that, in its 1981 order deregulating radio, the FCC correctly pared down its non-entertainment programming guidelines for commercial radio to require only that stations offer programming responsive to issues that the licensee determines are of concern to station listeners. According to Entercom Gainesville, since this deregulation, radio licensees have encountered ever increasing competition from outlets such as cable TV, the Internet, and satellite TV, creating economic incentives for broadcasters to air community responsive

Broadcast Localism  
MB Docket No. 04-233  
Comment Summary

programming. Entercom Gainesville states the Gainesville stations make concerted efforts to *program to the tastes of the community, and sponsor, support and participate in local community events and causes, including local hurricane relief efforts.* Entercom Gainesville attaches materials that it states document its commitment to community responsive programming and activities.

**Entercom Greensboro License, LLC (Entercom Greensboro) (11/1/04)**

Entercom Greensboro states that, in its 1981 order deregulating radio, the FCC correctly pared down its non-entertainment programming guidelines for commercial radio to require only that stations offer programming responsive to issues that the licensee determines are of concern to station listeners. According to Entercom Greensboro, since this deregulation, radio licensees have encountered ever increasing competition from outlets such as cable TV, the Internet, and satellite TV, creating economic incentives for broadcasters to air community responsive programming. Entercom Greensboro states the Greensboro stations make concerted efforts to *program to the tastes of the community, and sponsor, support and participate in local community events and causes, including charity fundraising, and the airing of programs that spotlight the spirituality and family life of members of the community.* Entercom Greensboro attaches materials that it states document its commitment to community responsive programming and activities.

**Entercom Greenville License, LLC (Entercom Greenville) (11/1/04)**

Entercom Greenville states that, in its 1981 order deregulating radio, the FCC correctly pared down its non-entertainment programming guidelines for commercial radio to require only that stations offer programming responsive to issues that the licensee determines are of concern to station listeners. According to Entercom Greenville, since this deregulation, radio licensees have encountered ever increasing competition from outlets such as cable TV, the Internet, and satellite TV, creating economic incentives for broadcasters to air community responsive programming. Entercom Greenville states the Greenville stations make concerted efforts to *program to the tastes of the community, and sponsor, support and participate in local community events and causes, including charity fundraising, and the airing of political debates.* Entercom Greenville attaches materials that it states document its commitment to community responsive programming and activities.

**Entercom Indianapolis License, LLC (Entercom Indianapolis) (11/1/04)**

Entercom Indianapolis states that, in its 1981 order deregulating radio, the FCC correctly pared down its non-entertainment programming guidelines for commercial radio to require only that stations offer programming responsive to issues that the licensee determines are of concern to station listeners. According to Entercom Indianapolis, since this deregulation, radio licensees have encountered ever increasing competition from outlets such as cable TV, the Internet, and satellite TV, creating economic incentives for broadcasters to air community responsive programming. Entercom Indianapolis states the Indianapolis stations make concerted efforts to

Broadcast Localism  
MB Docket No. 04-233  
Comment Summary

program to the tastes of the community, and sponsor, support and participate in local community events and causes, such as a water drive for victims of Hurricane Charley. Entercom Indianapolis attaches materials that it states document its commitment to community responsive programming and activities, such as production and distribution of several CDs featuring local musicians.

**Entercom Kansas City License, LLC (Entercom Kansas City) (11/1/04)**

Entercom Kansas City states that, in its 1981 order deregulating radio, the FCC correctly pared down its non-entertainment programming guidelines for commercial radio to require only that stations offer programming responsive to issues that the licensee determines are of concern to station listeners. According to Entercom Kansas City, since this deregulation, radio licensees have encountered ever increasing competition from outlets such as cable TV, the Internet, and satellite TV, creating economic incentives for broadcasters to air community responsive programming. Entercom Kansas City states the Kansas City stations make concerted efforts to program to the tastes of the community, and sponsor, support and participate in local community events and causes, and have won numerous public service awards. Entercom Kansas City attaches materials that it states document its commitment to community responsive programming and activities, including a weekday program called Kansas City Morning News.

**Entercom Madison License, LLC (Entercom Madison) (11/2/04)**

Entercom Madison states that, in its 1981 order deregulating radio, the FCC correctly pared down its non-entertainment programming guidelines for commercial radio to require only that stations offer programming responsive to issues that the licensee determines are of concern to station listeners. According to Entercom Madison, since this deregulation, radio licensees have encountered ever increasing competition from outlets such as cable TV, the Internet, and satellite TV, creating economic incentives for broadcasters to air community responsive programming. Entercom Madison states the Madison stations make concerted efforts to program to the tastes of the community, and sponsor, support and participate in local community events and causes, including a benefit concert for habitat for humanity. Entercom Madison attaches materials that it states document its commitment to community responsive programming and activities, including an hourly environmental program and an hourly multi-cultural music program.

**Entercom Memphis License, LLC (Entercom Memphis) (11/2/04)**

Entercom Memphis states that, in its 1981 order deregulating radio, the FCC correctly pared down its non-entertainment programming guidelines for commercial radio to require only that stations offer programming responsive to issues that the licensee determines are of concern to station listeners. According to Entercom Memphis, since this deregulation, radio licensees have encountered ever increasing competition from outlets such as cable TV, the Internet, and satellite TV, creating economic incentives for broadcasters to air community responsive programming. Entercom Memphis states the Memphis stations make concerted efforts to program to the tastes of the community, and sponsor, support and participate in local community events and causes,

Broadcast Localism  
MB Docket No. 04-233  
Comment Summary

including a December toy drive. Entercom Memphis attaches materials that it states document *its commitment to community responsive programming and activities, including a program called Homegrown that features unsigned artists.*

**Entercom Milwaukee, LLC (Entercom Milwaukee) (11/1/04)**

Entercom Milwaukee states that, in its 1981 order deregulating radio, the FCC correctly pared down its non-entertainment programming guidelines for commercial radio to require only that stations offer programming responsive to issues that the licensee determines are of concern to station listeners. According to Entercom Milwaukee, since this deregulation, radio licensees have encountered ever increasing competition from outlets such as cable TV, the Internet, and satellite TV, creating economic incentives for broadcasters to air community responsive programming. Entercom Milwaukee states the Milwaukee stations make concerted efforts to program to the tastes of the community, and sponsor, support and participate in local community events and causes, including a 14 hour program on hunger before Thanksgiving and a corresponding food drive. Entercom Milwaukee attaches materials that it states document its commitment to community responsive programming and activities, including a weekly public affairs program called Sunday Morning in Milwaukee.

**Entercom New Orleans, LLC (Entercom New Orleans) (11/1/04)**

Entercom New Orleans states that, in its 1981 order deregulating radio, the FCC correctly pared down its non-entertainment programming guidelines for commercial radio to require only that stations offer programming responsive to issues that the licensee determines are of concern to station listeners. According to Entercom New Orleans, since this deregulation, radio licensees have encountered ever increasing competition from outlets such as cable TV, the Internet, and satellite TV, creating economic incentives for broadcasters to air community responsive programming. Entercom New Orleans states the New Orleans stations make concerted efforts to program to the tastes of the community, and sponsor, support and participate in local community events and causes, including a four day radiothon to benefit Children's Hospital of New Orleans. Entercom New Orleans attaches materials that it states document its commitment to community responsive programming and activities, including a public affairs program hosted by community leaders.

**Entercom Norfolk License LLC (Entercom Norfolk) (11/1/04)**

Entercom Norfolk states that, in its 1981 order deregulating radio, the FCC correctly pared down its non-entertainment programming guidelines for commercial radio to require only that stations offer programming responsive to issues that the licensee determines are of concern to station listeners. According to Entercom Norfolk, since this deregulation, radio licensees have encountered ever increasing competition from outlets such as cable TV, the Internet, and satellite TV, creating economic incentives for broadcasters to air community responsive programming. Entercom Norfolk states the Norfolk stations make concerted efforts to program to the tastes of the community, and sponsor, support and participate in local community events and causes.

Broadcast Localism  
MB Docket No. 04-233  
Comment Summary

*Entercom Norfolk attaches materials that it states document its commitment to community responsive programming and activities, including a locally oriented program called Hampton Roads Perspectives.*

**Entercom Portland License, LLC (Entercom Portland) (11/1/04)**

Entercom Portland states that, in its 1981 order deregulating radio, the FCC correctly pared down its non-entertainment programming guidelines for commercial radio to require only that stations offer programming responsive to issues that the licensee determines are of concern to station listeners. According to Entercom Portland, since this deregulation, radio licensees have encountered ever increasing competition from outlets such as cable TV, the Internet, and satellite TV, creating economic incentives for broadcasters to air community responsive programming. Entercom Portland states the Portland stations make concerted efforts to program to the tastes of the community, and sponsor, support and participate in local community events and causes. Entercom Portland attaches materials that it states document its commitment to community responsive programming and activities.

**Entercom Rochester License, LLC (Entercom Rochester) (11/2/04)**

Entercom Rochester states that, in its 1981 order deregulating radio, the FCC correctly pared down its non-entertainment programming guidelines for commercial radio to require only that stations offer programming responsive to issues that the licensee determines are of concern to station listeners. According to Entercom Rochester, since this deregulation, radio licensees have encountered ever increasing competition from outlets such as cable TV, the Internet, and satellite TV, creating economic incentives for broadcasters to air community responsive programming. Entercom Rochester states the Rochester stations make concerted efforts to program to the tastes of the community, and sponsor, support and participate in local community events and causes. Entercom Rochester attaches materials that it states document its commitment to community responsive programming and activities.

**Entercom Sacramento License, LLC (Entercom Sacramento) (11/2/04)**

Entercom Sacramento states that, in its 1981 order deregulating radio, the FCC correctly pared down its non-entertainment programming guidelines for commercial radio to require only that stations offer programming responsive to issues that the licensee determines are of concern to station listeners. According to Entercom Sacramento, since this deregulation, radio licensees have encountered ever increasing competition from outlets such as cable TV, the Internet, and satellite TV, creating economic incentives for broadcasters to air community responsive programming. Entercom Sacramento states the Sacramento stations make concerted efforts to program to the tastes of the community, and sponsor, support and participate in local community events and causes, including charity fundraising. Entercom Sacramento attaches materials that it states document its commitment to community responsive programming and activities.

**Entercom Seattle License, LLC (Entercom Seattle) (11/2/04)**



Broadcast Localism  
MB Docket No. 04-233  
Comment Summary

*Entercom Seattle states that, in its 1981 order deregulating radio, the FCC correctly pared down its non-entertainment programming guidelines for commercial radio to require only that stations offer programming responsive to issues that the licensee determines are of concern to station listeners. According to Entercom Seattle, since this deregulation, radio licensees have encountered ever increasing competition from outlets such as cable TV, the Internet, and satellite TV, creating economic incentives for broadcasters to air community responsive programming. Entercom Seattle states the Seattle stations make concerted efforts to program to the tastes of the community, and sponsor, support and participate in local community events and causes, including charity fundraising. Entercom Seattle attaches materials that it states document its commitment to community responsive programming and activities.*

**Entercom Wichita License, LLC (Entercom Wichita)(11/2/04)**

Entercom Wichita states that, in its 1981 order deregulating radio, the FCC correctly pared down its non-entertainment programming guidelines for commercial radio to require only that stations offer programming responsive to issues that the licensee determines are of concern to station listeners. According to Entercom Wichita, since this deregulation, radio licensees have encountered ever increasing competition from outlets such as cable TV, the Internet, and satellite TV, creating economic incentives for broadcasters to air community responsive programming. Entercom Wichita states the Wichita stations make concerted efforts to program to the tastes of the community, and sponsor, support and participate in local community events and causes, including charity fundraising, and the airing of political debates. Entercom Wichita attaches materials that it states document its commitment to community responsive programming and activities.

**Entercom Wilkes-Barre License, LLC (Entercom Wilkes-Barre) (11/2/04)**

Entercom Wilkes-Barre states that, in its 1981 order deregulating radio, the FCC correctly pared down its non-entertainment programming guidelines for commercial radio to require only that stations offer programming responsive to issues that the licensee determines are of concern to station listeners. According to Entercom Wilkes-Barre, since this deregulation, radio licensees have encountered ever increasing competition from outlets such as cable TV, the Internet, and satellite TV, creating economic incentives for broadcasters to air community responsive programming. Entercom Wilkes-Barre states the Wilkes-Barre stations make concerted efforts to program to the tastes of the community, and sponsor, support and participate in local community events and causes. Entercom Wilkes-Barre attaches materials that it states document its commitment to community responsive programming and activities.

**Entravision Holdings, LLC (Entravision) (11/1/04)**

Entravision states that its programming is dedicated to the Hispanic market, and that it airs diversified Spanish-language programming in its full-service television stations and radio stations, most of which are located in the southwestern United States. Entravision's television

Broadcast Localism  
MB Docket No. 04-233  
Comment Summary

stations are affiliates of the two television networks of Univision. It owns radio stations that operate in 22 U.S. markets, including Spanish-language stations in the Los Angeles, San Francisco, Dallas-Ft. Worth, Phoenix, and McAllen, Texas markets.

Entravision supports the general premise that the Commission should continue to allow broadcast stations to rely on market forces and on issue-responsive programming as the incentives to fulfill the inherent duties of localism, but suggests that, in certain instances, especially when dealing with cable and satellite carriage of broadcast television stations, Commission action is required.

Entravision believes that radio and television broadcasters can differentiate themselves from cable and satellite companies by offering local programming. Entravision states the Commission's role should be in ensuring that the traditional broadcasters have an equal playing field with the new technologies.

Regarding the best way to promote coverage of issues of importance to minority communities, Entravision believes that the Commission must assert itself in the area of must-carry of television stations on cable systems. Entravision states that the Commission's current application of Must Carry Rules hinders localism efforts of independent, foreign language, and specialty stations. Entravision states the Commission has not been willing to affirm that local stations must be carried throughout their television markets, and that it must do so now.

By allowing cable systems to modify their markets in market modification proceedings, Entravision states the Commission has excluded stations, including Spanish-language stations, from the cable-viewing population. Entravision states that it is these stations that do the most to serve local needs.

Regarding the license renewal process, Entravision states that the Commission should leave the current license renewal process unchanged because it is sufficient to detect lapses in a station's public interest service requirement. Entravision states that imposing additional interim license reviews or additional license requirements will insert additional layers of cost and process into a procedure that has served both industry and the public interest well.

**Erben, Lida Lee Denney (1/28/04)**

Lida Lee Denney Erben contends that First Baptist Church, San Antonio, Texas, television broadcast should continue because it is important for those who are unable to actually attend church.

**Evans, James F. (10/21/04)**

Mr. Evans urges the Commission to seek ways to help maintain and encourage more localized agricultural programming on radio and television stations. He states that broadcast stations can

Broadcast Localism  
MB Docket No. 04-233  
Comment Summary

deliver decision guiding information to producers of food in a local and timely manner, which *helps them deal with changing local weather, soil conditions, markets, etc.*

Mr. Evans argues that local broadcast information services for producers have eroded badly, and that metropolitan based radio stations have reduced their agricultural programming, while local programming on smaller stations is being reduced by revised media ownership policies that permit concentration of programming and act against local coverage. Mr. Evans states that alternative information sources such as new electronic technologies are available, but they are limited in meeting the local information needs of producers. He also says access to broadband information is limited and often users have to pay for online agricultural information services.

According to Mr. Evans, there is local potential for web based information services to team with agricultural broadcast services of radio stations, but low-power FM stations may lack the financial resources to do this effectively.

Mr. Evans states that the timeliness, versatility and humanizing capabilities of agricultural radio and television programming can serve the needs for food safety, quality, and healthfulness. He further states that such issues have important local implications.

For the above reasons, Mr. Evans urges the Commission to seek ways of strengthening local agricultural programming. He states one way would be to strengthen the incentives such as with standards for public service programming for license renewal and increased local programming by smaller broadcasting stations. He also states some aspects of voice tracking technologies that compromise localized programming should be examined closely.

**Farnum, Lincoln (10/5/04)**

Mr. Farnum believes that broadcasters must be required to do more to enhance civic participation. He states that the FCC must define minimum standards for broadcasters to fulfill their public interest obligation through coverage of elections and civic affairs.

**Fertig, David R. (1/3/05)**

Mr. Fertig asserts that in Southern California and throughout the country, the few existing non-commercial, nonreligious radio broadcasters primarily depend upon traditional sources of funding and programming, "such as those generated by NPR, MPR, and APR." Religious programming, according to Mr. Fertig, is no less constrained. While conceding that these entities offer "fine general programming," Mr. Fertig complains that such programming affords little room for local voices "via the uniquely accessible medium of radio." This asserted lack of opportunity for local voices, according to Mr. Fertig, results in less development of talent, human resources and varied perspectives on the public airwaves. He argues that programming is increasingly centralized and, as a result, in terms of cultural, social and political perspective, is increasingly less diverse, vital, innovative, local, or available as a tool for citizen education or to make governments more accountable.

Broadcast Localism  
MB Docket No. 04-233  
Comment Summary

Mr. Fertig argues that radio is uniquely well suited to preserving conversations in local communities about culture, local issues, politics and philosophy. He asserts that, unlike television, cinema or print media, radio affords local call-ins and quick format changes to adapt to new and changing circumstances. Because it is a less expensive and “more portable” than other media, Mr. Fertig suggests that it is, by its nature, more local and better able to monitor local government. And because noncommercial media are less apt, in Mr. Fertig’s view, to “soft-pedal” controversial issues, he contends that community-based radio is vital to maintaining public accountability.

Mr. Fertig contends that, with increasing consolidation of radio-frequency ownership in commercial and noncommercial uses, voices are becoming “less varied, less local, and more constrained.” Noting that a number of radio frequencies are left unused, Mr. Fertig contends that, like public lands and other public rights-of-way, radio frequencies are the “natural property of the people.” Mr. Fertig describes regulatory entities such as the FCC as the “only bulwark for protecting the public interest” in common resources such as radio frequencies. According to Mr. Fertig, public and community voices, especially those with less access to mainstream and/or licensed broadcasters, deserve this access to ensure these resources are cultivated to produce the sort of accountability, awareness and communication such use can bring. For this reason, Mr. Fertig urges the FCC to permit the use of unused frequencies by non-profit, community-based entities and local low-power-FM broadcasters.

**Fife, Bruce, filed under Numerous (11/1/04)**

Mr. Fife, President, American Federation of Musicians, Local 99, Portland, OR, condemns media conglomerates, especially Clear Channel Communications, for their alleged adverse impact on “musical creativity and diversity and the livelihoods of musicians.” He alleges that due to Clear Channel’s “market share and vertical integration” there is “no interest in local programming or airplay for local artists.” He further asserts that Clear Channel “can leverage [its] radio stations against [independent] concert promoters, coerce artists to perform at Clear Channel venues, and generally threaten musicians with no airplay because of the monopolistic power they possess.”

To address these problems, Mr. Fife urges the Commission to “[r]oll back the number of radio stations and media outlets that any one company can own, [d]isallow cross ownership between radio stations and promoters and/or concert venues, and stop granting licenses to those broadcasters that are failing to serve the public interest.”

**Fisher, Robert, filed under Numerous (10/25/04)**

Mr. Fisher writes that television plays a critical role in the democratic discourse of our country. He believes the FCC has a responsibility to adopt a clearly defined public interest standard that “would ensure that broadcasters air, at a minimum, three hours per week of civic or electoral

Broadcast Localism  
MB Docket No. 04-233  
Comment Summary

affairs programming.” He contends the public interest obligations should be defined before the FCC considers any action on “must-carry.”

**Fox Television Stations, Inc. and Fox Television Holdings, Inc (Fox) (11/1/04)**

Fox contends that its stations are dedicated to localism. Fox claims that its stations provide a unique mix of local news and informational programming suited to the community’s viewers. To support the comments, Fox submitted 1213 pages of attachments documenting how each of its owned and operated stations serve their local communities via provision of political, news and public affairs programming, disaster warnings, public information and communications with communities.

Fox states that the Commission should not institute any new localism rules because Fox and other broadcasters are already achieving the Commission’s localism goals.

Fox states that additional regulation is unnecessary because broadcasters face competition from a variety of new media. With this competition, Fox contends that it will lose customers if it does not provide the local-oriented programming its audience member desire.

At its owned-and-operated stations, Fox aired more than 875 hours of regularly-scheduled local news per week, a substantial increase compared to the time period before Fox’s ownership. These newscasts contain extensive coverage of local, state and national political developments. Its stations also provide a variety of local politics and public affairs programs, and significant amounts of public service announcements. Furthermore, Fox stations provide considerable amounts of local and emergency service programming.

Despite its extensive local programming offerings, Fox says that the Commission should not impose localism regulations because different markets have different needs. In addition, Fox contends that the First Amendment requires the Commission to leave those decisions to the stations.

By providing the programming described above, Fox achieves the Commission’s localism goals without government intervention. Fox’s local focus also stems from the fact that its stations communicate and interact with their viewers. Its employees live in the communities they serve. Several owned-and-operated stations hold formal ascertainment meetings, while others hold discussion and communication groups. In addition, many station employees participate in community activities.

**Franklin Communications, filed by Debbi Gifford (11/16/04)**

Ms. Gifford submits these comments in her capacity as General Manager for two stations owned by Franklin Communications, Inc. that serve Crawford County, Ohio. Ms. Gifford expresses frustration that all broadcasters are being cast in the unfavorable light of neglecting their communities. Ms. Gifford maintains that stations WQEL-FM and WBCO-AM operate with “the

Broadcast Localism  
MB Docket No. 04-233  
Comment Summary

local interest of our communities in mind.” According to Ms. Gifford, the focal point of news aired by the two Franklin stations is local content, with state and national news being covered by its news affiliates. Ms. Gifford states that the stations’ focus on local news and local programming brings the station’s “team members” out to city council meetings, school board meetings, ribbon cuttings, and to talk with listeners on issues of importance to them.

According to Ms. Gifford, Franklin station WBCO-AM: hosts programming each weekday that showcases groups, events and local officials; replays each spring the county’s high school graduation ceremonies; and airs annually the locally sponsored men’s and lady’s bowling invitational. According to Ms. Gifford, Franklin’s station WQEL-FM devotes one hour per week to local musicians, five hours per week to local sports talk shows, and an average of five hours per week to local sporting contests. In addition, Ms. Gifford states that, in the last four years, stations WBCO-AM and WQEL-FM have coupled with the local newspaper to offer political candidates a two-hour public forum which is aired live on WQEL-AM and is then replayed on WBCO-AM. Ms. Gifford states that the local community has recognized the value of such programming.

**Freeman, John (12/20/04)**

Mr. Freeman expresses concern regarding the lack of coverage of local artists and music by “for profits.” He contends that it would an injustice to disallow the public a right to expand its LPFM participation.

**Future of Music Coalition (FMC) (11/1/04)**

FMC states that many of the challenges in the radio landscape are a result of the restructuring of radio station ownership that has taken place as an outgrowth of the 1996 Telecommunications Act and subsequent Commission actions. FMC asserts that local broadcasters have a vital historic role in providing exposure and opportunity for local, up-and-coming artists and for a wide variety of musical expression. It states that the study it submitted to the Commission in 2002 regarding radio consolidation documented the significant overlap of specific songs in multiple formats, addressing the myth that the creation of multiple formats is a substitute for diversity of content.

With respect to the issue of payola rules, FMC recommends that the Commission be more vigilant in enforcing the rules. Further, it suggests that the Commission require basic data from broadcasters indicating what songs they are playing and how they determine what makes their playlists. FMC commends the Commission for its work in implementing non-commercial LPFM radio stations, and urges the Commission to pursue other initiatives to strengthen LPFM and non-commercial radio as a whole.

**Gallagher, Colin (8/9/04)**

Broadcast Localism  
MB Docket No. 04-233  
Comment Summary

*Mr. Gallagher contends that the decrease in localism that he believes has occurred over time, “is directly proportionate to” efforts to increase media ownership. Increased ownership, and cross-ownership of media broadcasting corporations and mechanisms is problematic, in his view, because it places critical broadcast decisions in the hands of fewer people (“thus decreasing the level of diversity in broadcast decisions, and hampering the democratic process”), and because a decision to increase media ownership ultimately will result in a decrease in the ability of the media in America to meet technical parameters necessary to allow “expeditious increase in service (broadcast) and permitting (local and national).”*

Mr. Gallagher notes that, in June 2003, the Commission adopted a decision to ease most of the nation's media ownership rules, but that a year later that decision was remanded to the agency by a federal appeals court in Philadelphia. Mr. Gallagher states that, under the Commission's deregulatory policies, one company would have been allowed to own three TV stations, eight radio stations and the monopoly newspaper in a single market. Mr. Gallagher disagrees with this approach and argues that public views are not well represented by corporations such as Clear Channel and General Electric.

Mr. Gallagher also argues that the “slowness and tortoise-like movement” of large corporate entities, which the Commission has proposed should be allowed to own a greater share of media ownership, “hinders the process of meeting technical parameters necessary to ensure that communities are served,” increases corporate bureaucracy, and decreases the potential for localism. Mr. Gallagher states that part of the solution to “the problem of increasing media ownership and the tortoise-like corporate bureaucracy that comes with it” is to “abandon” the corporate process and “operate at a local level.” Specifically, as technology that allows private individuals to establish their own broadcast stations becomes cheaper and more readily available, and as corporate marketing becomes more “invasive and aggressive,” and as the Commission continues to decrease potential access by the public to existing broadcast mechanisms by awarding more licenses to corporations, Mr. Gallagher anticipates that more ordinary people will take steps to challenge corporate-owned and corporate-run broadcasting that, in his view, does not serve the public interest.

Mr. Gallagher suggests alternative approaches that he believes would address certain problems that he believes are associated with media consolidation. First, he urges the Commission to require corporations to devote a greater percentage of their broadcast time specifically to public programs. Mr. Gallagher further suggests that the Commission require that corporations hold a local vote three or four times per year, on the content of programming and how much time to devote to each program. Mr. Gallagher states that the Commission could even require that corporations allow members of the public a regular time each and every day to physically access stations and spread their own message. Mr. Gallagher argues that the Commission should take these steps in order to create “true localism.” Mr. Gallagher opines that, only when media reform occurs, and only when corporate control of media is decreased, will there be “true potential” for localism and democracy in America.

**Gallio, Alice (1/28/04)**

Broadcast Localism  
MB Docket No. 04-233  
Comment Summary

Letter is unreadable.

See Page 5 of the link below:

[http://gulfoss2.fcc.gov/prod/ecfs/retrieve.cgi?native\\_or\\_pdf=pdf&id\\_document=6515782097](http://gulfoss2.fcc.gov/prod/ecfs/retrieve.cgi?native_or_pdf=pdf&id_document=6515782097)

**Gamecock Alumni Broadcasters, LLC, (GAB), Amended Comments (12/27/04)**

GAB states that it fully endorses the comments of REC Networks. GAB urges the Commission to reject Robert Branch's proposal to allow NCE translators to "upgrade" to Low Power FM because this would allow FM translator owners to circumvent the local programming obligations.

GAB states that it agrees with the position that Low Power FM licensees and permittees be permitted to own and operate FM translators both within and without the reserved band. They also state that it is unfounded that Low Power licensees are utilizing technically inferior transmission facilities and technology.

GAB states that the Commission should consider revising the Low Power FM regulations to further encourage investment in the development of Low Power FM and assure continued service to the local community and that the Commission should consider, in appropriate circumstances, affording LP100 class stations limited primary status

GAB states that Low Power FM stations should be encouraged to transition to IBOC operations as market forces dictate.

**Gilmore, Forrest Reverend, filed under Numerous (8/23/04)**

Rev. Gilmore states, "The wealthy now control much if not most of our government and our media." He states that a media conglomerate ordered employees to get tickets for the FCC localism meeting. He urges the FCC to "get the wealthy out of our broadcasting," and that "we must begin by bringing reason and compassion back to the media of our country."

Rev. Gilmore calls on the FCC to reduce the concentration of media ownership and bring back the fairness doctrine.

**Goldberg, Robert M. (11/1/04)**

Mr. Goldberg urges the FCC to support local independent media. He states that he believes that, "a large number of diverse, local citizens providing the content of mass media gives this society the best chance of being exposed to the valid information and considered understanding that is necessary for the survival of a nation of, by, and for its people." Mr. Goldberg also states that much of the available evidence supports the view that concentrated media owned by corporations with other interests are the antithesis of such a nation.



Broadcast Localism  
MB Docket No. 04-233  
Comment Summary

**Goodman, Alan for Columbus Radio Group (10/28/04)**

Columbus Radio Group is comprised of four stations in Ohio. Mr. Goodman states that the news departments of these stations are dedicated to providing information that is critical to listeners including news, weather, traffic reports, emergency school closings, public affairs programming, and emergency news information.

Mr. Goodman contends that a high percentage of programming content evolves around the stations involvement in community events as well as news and weather, and that research indicates that listeners want to know that their favorite radio station is an active partner in the community that we broadcast in. Mr. Goodman notes that the sale of advertising revenue is predicated on the credibility of the station within the community and business community.

Mr. Goodman argues that the financial success of any radio station is predicated on cultivating the good will of the community in which it broadcasts, and states that "good will" is defined by how listeners, community leaders, and the business community perceive the station in the market in which it is licensed. Mr. Goodman contends that when broadcasters were first compelled to document local involvement they did so only to the extent that satisfied the minimum requirements but that today, however, broadcasters do more than would ever be required by the Commission.

**Goslin, Linda (1/28/04)**

Ms. Goslin states that KSAT broadcasts a local church service every Sunday and that it is her understanding that the station has broadcast this service every Sunday morning for the past 30 years. She says that watching this service prompted her and her family to become members of the church. Ms. Goslin states that she is grateful for the broadcast of this church service and she requests that the FCC not take away the Sunday time slot.

**Gray Television Group, WKBO-TV (11/1/04)**

WKBO describes its activities at the local level, including coverage of local news, health issues, local weather, and local sports. In addition, it states that it sponsors political programming, community service and reaches out to the minority community.

**Greater Media Boston (1/3/05)**

Greater Media Boston states that it operates five FM radio stations that are licensed to communities in the Boston area and that these stations engage in a multi-pronged approach to determine the problems, needs, and interests of their communities: first, the station regularly solicits input from listeners regarding issues of interest to the community; second, many of the stations conduct regular polls and research on their websites; and third, many stations invite community leaders to suggest topics of importance.

Broadcast Localism  
MB Docket No. 04-233  
Comment Summary

Greater Media Boston states that each station broadcasts daily programming that provides current news, weather, and traffic information. Various examples of public affairs programming and public service announcements are provided. Examples of political and emergency broadcast programming are also provided. Greater Media Boston also states that the stations have participated in numerous local fundraising events which are specified.

Greater Media Boston states that each station conducts extensive local music testing to design and develop its play lists and other content and that the stations do not subscribe to any national play list.

**Greater Media New Jersey (1/3/05)**

WDHA-FM and WMTR-AM state that they are licensed to communities in Morristown, New Jersey and Bridgewater, New Jersey and that both stations broadcast daily programming that provides current news, weather, and traffic information. WMTR states that it airs 10 local newscasts per day Monday through Friday and airs 145 traffic reports per week. WDHA states that it broadcasts 100 traffic reports a day. Each station states that it broadcasts weekly public affairs programming that addresses specific topics of interest to the community. Examples of such programming are provided.

Each station states that it broadcasts public service announcements on a broad range of topics: WMTR airs approximately 35 per week; WDHA up to 20, promoting issues such as automotive safety and anti-drunk driving campaigns. Additional examples are provided.

WMTR states that it broadcasts two weekly programs that address local political and other public affairs issues. Descriptions are provided of those programs.

The stations state that all are equipped for EAS broadcasts and "Amber Alerts" to assist local authorities in locating missing children.

The stations state that they do not subscribe to national play lists; rather, these stations use their own websites as a source of communication with and feedback from listeners. Each station also states that it is an active participant in its local community, particularly with respect to fundraisers. Specific examples are provided.

**Greater Media Philadelphia (1/3/05)**

Greater Media Philadelphia states that it operates three FM stations and one AM station licensed in Philadelphia. It states that each station broadcasts daily programming that provides current news, weather, and traffic information and that each station broadcasts weekly public affairs programming that addresses specific topics of interest to the community. Various examples of such programming are provided.

Broadcast Localism  
MB Docket No. 04-233  
Comment Summary

*Greater Media Philadelphia states that the stations air numerous public service announcements and participate in fundraising events. Examples of such events are provided. In addition, examples of political programming are listed.*

**Greater Media, Inc. (Greater Media) (12/8/04)**

Greater Media states that it operates a total of 19 AM and FM stations in Boston, Philadelphia, Detroit, and several communities in New Jersey. Greater Media states that its stations engage in a multi-pronged approach to determine the problems, needs, and interests of their communities: first, the stations solicit input from listeners regarding issues of interest, both through on-air announcements and on the station websites; second, many of the stations conduct polls and research on their websites; and third, many stations invite community leaders to suggest topics of importance to their constituents, or ask station members to participate in local community organizations.

Greater Media states that its stations broadcast daily programming that provides current news, weather, and traffic information and that, in addition, each station broadcasts weekly public affairs programming that addresses specific topics of interest to the community. Greater Media provides examples of various public affair offerings. Greater Media also states that its stations air hundreds of public service announcements and promote local civic and charitable fundraising events. Greater Media provides examples of political programming that has been aired by its stations. Greater Media also states that all of its stations participate in EAS broadcasts and local Amber Alerts to assist local authorities in locating missing children.

Greater Media states that its stations conduct extensive local music testing to design and develop its play lists and that its stations do not subscribe to any national play list. It also states that many of its stations broadcast regular programming that is designed to spotlight local artists or music outside the station's format.

Greater Media cites a recent NAB survey indicating that terrestrial broadcasters donated \$9.6 billion in cash, goods and services to their local communities in 2003. Greater Media provides examples of fundraising events in which its stations have participated.

Greater Media indicates that its stations devote a substantial portion of air time, financial resources, and outreach efforts to (1) creating an ongoing dialogue with listeners and the general public; and (2) using that dialogue to create programming and community events that serve the public interest. Greater Media states that it does not believe that additional policies, practices or rules will best serve to promote localism and that imposing additional standards could be counterproductive by focusing broadcasters on rules instead of communities. It also states that it believes the most effective way to ensure that broadcasters serve the public is to permit and encourage station management to deploy station resources in a way that best complements the station's format, demographic, and relationship within the community.

**Grisham, Julie (01/28/04)**

Broadcast Localism  
MB Docket No. 04-233  
Comment Summary

*Ms. Grisham contends that broadcasters need to change the way that they handle captioning for the deaf/hard of hearing. Ms. Grisham cites specific problems with the current mode of captioning including: weather segments, live reports, banner announcements, emergency broadcasts, and general problems.*

**Gustafson, Howard (7/27/04)**

Mr. Gustafson attended the Localism Task Force Hearing in Monterey, California and submits these additional written comments for the record. Mr. Gustafson is not concerned about consolidation of media as long as the Commission is "there to regulate them honestly." He states that, in the 1980s, he was concerned about CNN and Headline News "taking over" and was concerned about the homogenization of the news. He believes that that problem was rectified with the advent of the Rush Limbaugh and Fox News programs, which he describes as "fair and balanced."

Mr. Gustafson would like cable companies to offer an "affordable ala-cart menu." He expresses dissatisfaction with the limited program options available with Comcast's "Limited Basic" programming package and with the price of Comcast's alternative menu, the Expanded Basic programming package. In addition, Mr. Gustafson states that, with an "ala cart menu," parents don't have to worry about parental control and single parents on fixed incomes can provide quality viewing for their children at affordable rates.

Mr. Gustafson urges the Commission to "stop the practice of channel blocking by local stations." Mr. Gustafson argues that local TV stations should not be allowed to block viewing of a program or station that is outside of the viewer's local area and viewers should not be forced to watch shows aired by the local station.

Finally, Mr. Gustafson asks the Commission to regulate the volume of television commercials and adopt a rule requiring that commercials and scheduled programming be aired at the same volume.

**Broadcast Localism**  
**MB Docket No. 04-233**  
**Comment Summary**

***Hackney, Patricia (10/14/04)***

Ms. Hackney states that regulators need to keep foremost in mind that the airwaves are public, and that those using the airwaves are required to serve the public interest. She believes that diversity of information and broad access are vital to the free flow of ideas. Ms. Hackney states that large companies like Clear Channel and Sinclair Broadcasting hurt diversity, restrict access to the airwaves, and weaken democracy by controlling too much of the airwaves because they are using their control for political and personal gain, not the public good.

***Haertner, Kirby and Kathy (1/28/04)***

Kirby and Kathy Haertner write in support of airing Sunday church services of First Baptist Church of San Antonio, TX.

***Hand, Loretta (1/28/04)***

Ms. Hand states that the First Baptist Church, San Antonio, Texas, television broadcast is the only contact many have with church, including those that are homebound.

***Frank Hansche (12/31/03)***

Mr. Hansche states that he is a Part 15 broadcaster in Washington State. Mr. Hansche contends that the first step in restoring localism is protecting and expanding Low Power Radio.

Mr. Hansche requests expedited relief of translator and service status reform as set forth in a Nov. 14 Petition filed by Amherst Alliance and 52 other parties. In addition, he states the Commission should answer the same petition's call for relief from interference caused by In Band On Channel (IBOC) Digital Radio.

Mr. Hansche requests that the Commission recommend to Congress action to repeal the current statutory requirement for third adjacent spacing for LPFM stations. Mr. Hansche cites the recommendations of the Commission's technical staff and Mitre Report to support this request.

Mr. Hansche suggests consideration be given by the Localism Task Force to a Petition for Rulemaking to establish a new Low Power AM Radio Service.

***Frank Hansche (7/23/04)***

Mr. Hansche urges the Commission to establish a new Low Power AM radio service. He contends bringing Low Power to the AM band will allow local ownership of radio stations to flourish in areas where LPFM cannot reach. Mr. Hansche contends that Low

**Broadcast Localism  
MB Docket No. 04-233  
Comment Summary**

*Power AM is the only way that Low Power radio will ever establish a meaningful urban presence in some cities.*

Mr. Hansche contends that Low Power AM offers the Commission a second chance to allow some Low Power radio stations the opportunity to serve as engines of entrepreneurship and economic growth.

Mr. Hansche agrees with the Amherst Alliance that the FCC does not need to wait for the completion of this NOI on Broadcast Localism before it proceeds to solicit comment on a proposed rule to establish Low Power AM. As a result, he urges the Commission to grant the July 14, 2004 motion and take such other steps as may be needed to establish a new, Low Power AM radio service in the near future.

**Hartner, Douglas (1/28/04)**

Mr. Hartner supports the First Baptist Church, San Antonio, Texas, television ministry and urges the FCC to keep local services as they are. He states that his household consists of three senior citizens who do not want local coverage altered in anyway or taken over by national broadcasts. Mr. Hartner also states that he was forced to purchase cable to view some sport events, which is burdensome.

**Hemy, A.F., filed under Numerous (1/28/04)**

Hemy files comments in support of the weekly broadcast of San Antonio's First Baptist Church.

**Hern, Rachel (1/28/04)**

Ms. Hern supports religious programming on her local station.

**Hinchcliff, Inez B. (1/28/04)**

Ms. Hinchcliff comments that she appreciates the religious broadcasting of the First Baptist Church, because it is the only way for some to "hear the Word of God." Ms. Hinchcliff states that her mother and friends with illnesses watch the sermon on KSAT every Sunday morning. Ms. Hinchcliff states that she would like the continuance of the broadcast.

**Hinton, Marilyn (1/28/04)**

Ms. Hinton states that the First Baptist Church, San Antonio, Texas, broadcast of its Sunday service allows those who are unable to attend church, like her grandson who was unable to do so during his illness, to continue to be a part of church fellowship and to

**Broadcast Localism**  
**MB Docket No. 04-233**  
**Comment Summary**

*participate in worship. Ms. Hinton also states that television ministry is very important to people residing in nursing homes and to the elder community.*

**Holmgren, Rod, filed under Numerous (8/23/04)**

Mr. Holmgren submits his statement from an FCC Hearing on July 21. Mr. Holmgren explains that he is a retired journalism professor, and that his comments relate to Lowry Mays and Clear Channel Communications. He indicates that he is handing out copies of his book, "Outrageous Fortunes." According to Mr. Holmgren, the book calls attention to the FCC's decision in 1996 to change the rules on ownership. He urges the Commission to consider returning to the old limits, "so that we won't have any more Clear Channel Communications explosions of ownership."

**Hoover, Eleanor, filed under Numerous (8/23/04)**

Ms. Hoover states she lives in Marina, CA, and has USA Media as her TV provider. She states she could not get access to important meetings of the Panetta Institute, which is only a mile away from where she lives and where USA Media is located. Ms. Hoover asks the Commission to remedy this situation.

**HOPE – Helping Our Peninsula's Environment (8/23/04)**

HOPE contends that, "[w]e are not being served by local TV broadcasting. One-sided pro-business / anti-environmental local news reporting is standard here." HOPE provides the following example: "A water supply/building moratorium is a major current local front-page controversy. All three peninsula newspapers at least mentioned there was public support for the moratorium at the single hearing, July 7, 2004." HOPE then notes that "[n]one of the three major local English language TV stations (KSBW, KION, KCBA) allowed any mention of public support for the moratorium – but they *all provided extensive coverage of the moratorium by those who had a direct financial interest in it.*"

HOPE suggests that we need "meaningful broadcast time dedicated to genuine, unedited (except for slander) public letters to the editor – just as [their] unedited comments are given to local City councils and broadcast live to our community over cable." HOPE also asks that "[f]or every minute of local 'news' – please require local TV and radio stations [to] provide an equal number of minutes, in adjacent time (not 4 am), for local unedited video 'letters to the editor' spoken by their authors or a person they choose."

**Hormel, Lucinda (10/05/04)**

Ms. Hormel believes that broadcasters must be required to do more to enhance civic participation. She states that the FCC must define minimum standards for broadcasters to fulfill their public interest obligation through coverage of elections and civic affairs.

**Broadcast Localism**  
**MB Docket No. 04-233**  
**Comment Summary**

***Hughes, Christina (10/05/04)***

Ms. Hughes believes that the airwaves belong to the public and that broadcasters must be required to do more to serve the public interest. She states that the FCC must define minimum standards for broadcasters to fulfill their public interest obligation through coverage of elections and civic affairs.

**Hurst, Howell, filed under Numerous (8/23/04)**

Mr. Hurst states that some Americans are suspicious that federal officials are in collusions with the highest multi-national American corporate interests. He states that citizens have a sacred obligation to deal with Constitutional violations, and that the "insidious media monopoly" must be brought under control.

**Hutcheon, Bonnie (8/23/04)**

On the subject of political programming, Ms. Hutcheon states that free time for issue debates should be provided in campaigns.

Ms. Hutcheon also states that there should be more ethnic representation on local news, noting that Monterey, California is 50% Hispanic but the newscasters are all white. She states that programming should also be modified so that children's needs are better served, and that the handicapped are not represented in television.

Ms. Hutcheon believes that voice tracking should not be allowed.

Ms. Hutcheon also contends that the FCC should limit the number of stations that TV and radio companies can own, and should combine oversight and regulations of television, cable, digital and radio. She also believes that the FCC should increase regulations of indecency, violence and language on television, and that local stations should have the right to reject national programming.

**Hutchins, Robert (9/21/05)**

Mr. Hutchins states that translators serve local communities only when they improve the reception of existing local stations, and that translators are meant to even out the coverage of local stations and must not be used as a back door for the expansion of national networks.

Mr. Hutchins states that LPFM broadcasting serves local people by providing a common forum for the discussion of common interests and issues. He states that the voices of these people must not be silenced by the prepackaged agendas of national interests whether financial, religious or political.



**Broadcast Localism**  
**MB Docket No. 04-233**  
**Comment Summary**

Mr. Hutchins states that issues promoted by outside interests, if locally relevant, should be discussed by the community and within the community. Mr. Hutchins also states that translators should not be allowed to preempt the signal of community-based LPFM stations.

**Illini Media Company (IMC) (1/3/05)**

IMC states that it is the licensee for WPGU-FM in Illinois. IMC provides examples of political coverage provided during the 2004 election including local races. IMC also provides examples of local community service including various fundraising efforts that were promoted.

**Illini Media Company (IMC) (10/27/04)**

IMC states that its station, WPGU, broadcasts a play list based on feedback from the community and artists. In addition, IMC considers news to be critical to the success of a radio station, and lists its various news programs. IMC claims that WPGU is committed to community, civic, and cultural programming, and community involvement.

IMC is concerned about recent subpoenas issued by New York State Attorney General, Eliot Spitzer regarding payola. IMC claims that it supports local artists rather than allowing major record labels to dictate the music it broadcasts, and states that WPGU tailors its broadcasts to the community.

IMC supports the Commission's NOI regarding broadcast localism.

**Illinois Farm Bureau (8/31/04)**

IFB states that in order to make vital decisions, farmers and ranchers need detailed and timely weather information, local news, up-to-the-minute market reports, and news affecting production agriculture.

According to IFB, trends in radio today are in the direction of less farm programming. IFB states that, according to the National Association of Farm Broadcasters (NAFB), the number of on-air broadcasters in the NAFB has declined to 136, down from 225 in 1998, and recently two 50,000 watt radio stations (one in Minneapolis and one in Chicago) cut their farm programming.

IFB has identified several factors that it says have led to the decrease in farm programming: in the late 1990s, large ownership groups acquired hundreds of radio licenses following changes in media ownership rules; national farm advertising has dropped 45 percent in the last five years; and local farm advertising declined even more. IFB contends the declines can be attributed to a weaker farm economy, a consolidation of